

Safety Evaluation Number¹: SE-W375-00-00008 Revision No: 0

ABCN Number: ABCN-W375-00-00012

Safety Evaluation Subject: Identification of an Implementing Standard for Maintenance

PART I: DESCRIPTION OF THE PROPOSED REVISION, BACKGROUND, AND SCHEDULE

1. Describe the proposed revision (including credible failure modes, if applicable).

The change revises the implementing standards for safety criteria 7.6-1 through 7.6-4 in the SRD from various sections of the ISMP to IAEA 50-SG-07. The tailored standard will be included as a new appendix to the SRD. Correct citation of SRD Appendix A in safety criterion 7.6-3

2. Identify the affected Authorization Basis (AB) documents and perform a comparison and assessment of the revision against the AB.

The affected portions of the authorization basis are Safety Criteria 7.6-1 through 7.6-4 which currently reference various sections of the ISMP as the implementing standards for the maintenance program. The change will delete the ISMP references as the implementing standards and replace them with IAEA 50-SG-07, as tailored for use on the RPP-WTP project. The tailored standard will be defined in a new appendix to volume 2 of the SRD.

The assessment of the change against the AB is contained in section II below.

3. List the references used for the safety evaluation.

BNFL-5193-SRD-01, Revision 2e, TWRS-P Safety Requirements Document

BNFL-5193-ISM-01, Revision 4b, TWRS-P Integrated Safety Management Plan

BNFL-5193-ISAR-01, Revision 0, TWRS-P Initial Safety Analysis Report

DOE/RL-96-0005, Revision 1, Concept of the DOE Regulatory Process for Radiological, Nuclear, and Process Safety for TWRS Privatization Contractors

DOE/RL-96-0006, Revision 1, Top-Level Radiological, Nuclear, and Process Safety Standards and Principles for TWRS Privatization Contractors

DOE/RL-98-01, DOE Regulatory Unit Evaluation Report of the BNFL Inc. Safety Requirements Document

DOE/RL-98-03, DOE Regulatory Unit Evaluation Report of the BNFL Inc. Integrated Safety Management Plan

DOE/RL-98-09, DOE Regulatory Unit Evaluation Report of the BNFL Inc. Initial Safety Assessment

DOE/RL-98-20, DOE Regulatory Unit Evaluation of BNFL Inc. Safety Requirements Document, Revision 1

4. Describe the planned revision implementation schedule.

The standard will be incorporated into the SRD within 30 days of receipt of RU approval.

¹ The Safety Evaluation Number shall be obtained from Project Document Control.

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PART II: REGULATORY IMPACT OF PROPOSED AB REVISION

The following questions are to be answered as part of the safety evaluation, to determine if the proposed AB revision (and the proposed initiating change if applicable) requires prior RU approval.

- | | <u>YES</u> | <u>NO</u> |
|--|-------------------------------------|-------------------------------------|
| 1. Does the revision involve the deletion or modification of a standard previously identified or established in the approved SRD? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| JUSTIFICATION: | | |
| Yes. The change deletes the sections of the ISMP currently cited as implementing standards for safety criteria 7.6-1 through 7.6-4 and replaces them with a citation of IAEA 50-SG-07, as tailored for the RPP-WTP. | | |
| 2. Does the revision result in a reduction in commitment currently described in the AB? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| JUSTIFICATION: | | |
| No. The citation of a new implementing standard does not result in a reduction in commitment contained in the AB. The appropriate ISMP sections are not being deleted by this change. | | |
| 3. Does the revision result in a reduction in the effectiveness of any program, procedure, or plan described in the AB. | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| JUSTIFICATION: | | |
| No. This change does not revise any program, plan or procedure described in the AB, as noted in question II.2 above. | | |

Note: Guidance on defining the terms and responding to the above questions is provided in K70C528, Code of Practice for Managing Changes to the Authorization Basis, Appendix 6.

If all the answers to the above questions are no, then the change can be made without prior RU approval.

If any of the above answers is yes, then RU approval is required prior to implementation of the AB revision (and the initiating change if applicable). An ABAR shall be prepared to obtain RU approval (see K70C528, Appendix 7.)

PART III: SAFETY EVALUATION CONCLUSION

- ☐ All PART II questions are answered No. Therefore, RU approval is NOT required prior to implementing the proposed AB revision (and initiating change where applicable).
- ☒ At least one PART II question is answered Yes. Therefore, RU approval IS required prior to implementing the proposed AB revision (and initiating change where applicable). Issuance of an ABAR is required to obtain RU approval.

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Evaluator/Originator

Date

Reviewer²

Date

Radiation Safety and Regulatory Manager

Date

Chair, Project Safety Committee³

Date

RPP-WTP General Manager³

Date

² The reviewer should be a person from the same department as the Evaluator/Originator and at least as qualified as the Evaluator/Originator to conduct safety evaluations.

³ This signature required if Safety Evaluation concludes AB change can be made without RU prior approval. If RU approval (ABAR) is required, PSC and GM signatures occur on the ABAR.